

the expertise necessary to perform the number assignment and registration functions.

The Registrar would make routine number assignments under the numbering guidelines adopted through the Council process and approved by the Commission. This Registrar would not make policy decisions or business decisions for the telecommunications industry, as has been the case with Bellcore's role as NANP Administrator. The staff of the Registrar would interact with the Council as observers, but they would not chair the industry's activities.

Pending replacement of Bellcore with an alternative Registrar entity, Bellcore's NANPA staff (and the RBOCs' similar staffs) could continue to perform the functions assigned to the proposed Registrar. While the industry and the interested governmental agencies wrestle with constructing the alternative NANP Council, the Commission should impose measures to ensure separation between Bellcore and the staff who administer the NANP.

The Commission's role in the revised number administration system would include establishment of guidelines and procedures to facilitate the policy/business decisionmaking process. The six-month timeline, the 30-day comment cycle, and the specific requirements for filing resolution statements and progress reports would be set out in the Commission's rules. The Commission also would place consensus resolutions on an expedited public comment cycle, it would resolve any remaining issues, and

it would interact with its equivalent agencies in Canada and the Caribbean.

The Commission would have overarching authority to decide how these numbering assets should be allocated and managed, after reviewing the needs of all segments of the industry, ratepayers, and the state regulatory agencies. For the other countries within World Zone 1, the Canadian DOC, and the respective governments of the Caribbean nations, would continue to be involved in policy setting functions as they are today. The Commission, and its counterparts in other World Zone 1 nations, would determine whether only the Commission should interact with the NANP Council, or whether all the governments would interact directly with the Council.

The new structure would utilize a public notice process to inform all industry participants of the date and time of scheduled meetings, the agenda items, and any decisions reached. Documentation created by this NANP process could be handled in a manner similar to the FCC's current document contracting system. The FCC could use the current copy contractor or issue a bid for contracts for the NANP documentation function.

Finally, the Commission's complaint process should remain available to resolve disputes which are not suitable for resolution in the rulemaking environment. For example, a complaint could be filed when a company believes the Council or Registrar is engaged in anti-competitive behavior against that company. Mediation and arbitration processes could be used to

resolve issues which do not affect the entire industry but which affect more than one party. The party filing for Commission enforcement would determine which enforcement process to request and would follow the Commission's appropriate procedures.

MCI's proposed modifications are intended to make the process more certain, to increase the opportunities for small entities to participate, and to shorten the cycle time of industry activities. As evidenced by the comments received in this docket, the present NANP function, the defacto setting of public policy, and the industry issue resolution process are subject to substantial criticism. The new structure would separate the ministerial administration of numbers from discussions of business issues, and from policymaking functions.

II. The Commission Should Initiate a Rulemaking To Examine Numbering Issues

MCI urges the Commission to initiate a rulemaking proceeding so that the industry may address the options for revising the numbering system. MCI's proposals contained in these comments could be further refined in such a rulemaking.

NARUC's petition has requested examination of certain numbering issues, including: the potential strategies for the deployment of telephone numbers and other NANP codes required to implement new services such as PCS; and equitable plans for assigning NANP codes among the competing interests of local exchange carriers, interexchange carriers, the enhanced service

providers, cellular mobile carriers, and emerging PCS providers.²¹ NARUC also requested that the Commission consider what effects a new numbering scheme may have on the types of existing customer premises equipment and the dialing patterns familiar to users; and what costs might be involved in adapting switching equipment to the new numbering scheme. MCI concurs that these issues should be discussed in a rulemaking proceeding. The rulemaking proceeding should also address alternative numbering schemes, number portability, and related international issues.

A. The Numbering Rulemaking Should Consider Alternative Numbering Arrangements

All of the numbers and codes which are administered by Bellcore and the RBOCs should be subject to review in the Commission's rulemaking. NARUC's Petition noted that Bellcore administers only a portion of the universe of numbers and codes in use within World Zone 1.²²

²¹ National Association of Regulatory Utility Commissioners, Petition for Notice of Inquiry Addressing Administration of the North American Numbering Plan, filed Sept. 26, 1991.

²² The numbering codes administered by Bellcore include: (1) Number Plan Area codes dialed by users to reach the called party; (2) Automatic Number Identification information (ANI) digits used in processing and routing the telephone calls through the network; (3) Carrier Identification Codes (CICs) dialed by users to reach specific purchasers of access services; (4) domestic telecommunications Credit Card Issuers Identification (CIID) codes used in the routing of calls billed to credit cards; (5) Interexchange Carrier Operator access codes; (6) Service Area Codes (SACs); (7) 800 NXX Codes; (8) 900 NXX Codes; and (9) signalling point codes used as addresses in Signalling System 7 (SS7) signalling messages.

There is a universe of numbers and codes for which NANPA and the RBOCs have no administrative role. Numbering approaches for certain future services have not been adopted and, therefore, these numbers and codes are not administered by Bellcore's NANPA. NARUC identified some new codes that will require administration, including: (1) Intermediate Signalling Network Identifier (ISNI) codes used to identify the SS7 signalling network for some messages; (2) number assignments for the Public Switched Digital Service (PSDS) offerings; (3) number assignments for PCS; and (4) number assignments and administration of the 800 database, if approved by the Commission. In addition, computer services and frame relay services use number formats which are outside the numbering scheme administered by Bellcore. These codes and numbers should be included in the future number administration scheme.

Many options could be considered to modify the NANP numbering arrangements; MCI offers two. One option for changing the numbering scheme could simply use a longer numbering format. The 10-digit numbering format is simply a carryover from the historical period when the industry was confined to black rotary dial telephones subscribed from one telephone conglomerate. There is no magic to ten digits. As this outdated format demonstrates, future number expansion should not be measured only against today's technology. If the communications industry requires a longer number string -- whether now or in the future -- expansion of the industry should not be constrained by the 10-

digit format.²³

Another option for numbering should include carrier/network identifiers. MCI believes that an approach using carrier/network identifiers is necessary in some instances. Carrier/network identification would be better for conducting international communications, and identifiers can be used for domestic applications as well.

B. The Rulemaking Should Consider Allocation of Non-Geographic Numbering Plan Area Codes.

In response to Bellcore's Long-Range Numbering Plan,²⁴ MCI has argued that it is not necessary to divide the NPA numbering resource into categories for allocation purposes,²⁵ especially given the long-term evolution toward INPAs. This resource instead should be viewed as an industry resource available to all participants. Continuing to divide the resource into categories for use in code assignment and reservation attempts to legitimize a business-as-usual approach. Arbitrary allocation to predefined categories pre-judges the industry's needs and the outcome of

²³ It is worth noting that the international standard (CCITT Recommendation E.164) already enables up to 15 digits in future numbering schemes (Time T).

²⁴ Although Bellcore and the industry are preparing a Long-Range Numbering Plan, this Commission can and should play role in number planning.

²⁵ See Letter from Robert W. Traylor, Jr., MCI, to Fred Gaechter, Bellcore NANP Administration, dated Apr. 29, 1992, at p.1.

public policy issues.²⁶ Categorization merely formalizes the bias evident in the current numbering process. For example, saying that international inbound network identification fits neither the geographic nor the non-geographic category as defined in the past provides a convenient excuse for denial of resource assignments for international use. If the NANP is viewed as a resource available to all industry segments based upon public policy determination, then it does not matter if an NPA is assigned from a geographic or non-geographic pool of codes.

C. The Rulemaking Should Consider Local Number Portability

The rulemaking proceeding initiated to address alternative numbering arrangements should also examine the feasibility of local number portability for general calling. This is important because an ability by consumers to port numbers between carriers maximizes consumer choice. Also, as the Commission has recognized, number portability is expected to promote full competition in communication services, as in the case of 800-number services.²⁷ The design, implementation and operational considerations associated with local number portability would appear to be different than those for 800-number portability and, thus, local portability should be examined on its own merits.

²⁶ There may be some legitimacy for reserving a set of codes to facilitate expansion, or as SAC-like codes, due to a special characteristic such as a "9" in the "B" digit position. This should be subject to industry discussion.

²⁷ Provision of Access for 800 Service, Memorandum Opinion and Order on Reconsideration and Second Supplemental Notice of Proposed Rulemaking, 6 FCC Rcd. 5421 (1991).

MCI looks forward to fully participating in discussions regarding number portability.

D. International Issues Should Be Considered in the Numbering Rulemaking

Any rulemaking which addresses planning for the numbering process should consider international uses. These issues include World Zone 1 (WZ1) issues and issues involving international communications from outside WZ1. As mentioned above, the governments of the U.S., Canada, and 16 Caribbean nations are involved in some aspects of the NANP process. These countries could continue to participate in NANP administration.

E. The Costs of NANP Administration Should Be Shared among all Participants in the Process

Before the Commission can decide how to redistribute the payments for costs of NANP administration functions, it must first determine how much it costs to administer the numbering plan and to manage the industry's discussion fora. Costs should be considered in the rulemaking established to address restructuring of the number administration process.

After a budget of expenses is determined, the total costs of administration should be divided among all the various participants. MCI is willing to pay its equitable share of the costs of number administration under a revised numbering structure, as should others.

The Commission notes (Notice at ¶¶ 33-35) that the costs of number administration are currently paid by the RBOCs to Bellcore. The numbering costs associated with access services

are, in turn, recovered in full through the access charges paid by the RBOCs' customers, including the interexchange carriers. In a revised numbering scheme, these access costs would constitute only part of the cost recovery mechanism. Therefore, access fees should be reduced commensurately when the numbering costs are recovered from the additional sources.

III. The Commission Should Consider Both Near-Term and Long-Term Alternatives for Personal Communications Services

Numbering schemes for Personal Communications Services (PCS) need to be considered from a near-term and a longer-term perspective.

As a near-term solution, MCI favors the use of a SAC to provide PCS. SACs have the significant advantage of providing non-geographic routing for calls, thereby providing effective and efficient routing for a non-geographic based service. The precedence for the use of SACs for non-geographic services has already been established, i.e., 800 and 900 SACs. Since SAC numbering is already accommodated by the NANP, implementation, with a currently unassigned SAC (e.g., 500), could proceed quickly after assignment of numbers, thereby allowing the telecommunications industry to propel personal communications services near-term on a national basis.

Pending adoption of a Long-Term Numbering Plan, Bellcore has indicated that it would consider assignment of SACs for PCS use. MCI and others have requested NXX assignments within the PCS SAC for use in providing PCS services, and Bellcore has indicated its

intention to grant these requests. The ICCF is currently working on assignment guidelines for the SAC. MCI urges the Commission to support the assignment and implementation of the SACs for near-term PCS.

There are currently several types of PCS approaches under development, and optimal longer-term PCS numbering will depend on which approaches are ultimately adopted. As the Commission notes (Notice at 6, note 50), PCS is also under discussion in international fora. The CCITT is developing international standards for Universal Personal Telecommunications (UPT).²⁸ There are several long-term numbering options under discussion in the CCITT.²⁹

At this juncture, MCI favors utilizing Non-Geographic NPA codes as the longer-term solution for PCS. This approach aligns with the Country Based Scheme in CCITT Draft Recommendation E.168. Such an approach provides the same advantages as the near-term SAC plan, as well as the benefit to potentially provide PCS service to a vastly larger number of consumers. If, as anticipated, the demand for PCS services is high, the number of users capable of being served via the SAC approach could quickly be limited. With the advent of Interchangeable NPA codes, this problem is easily alleviated.

²⁸ CCITT Recommendation F.850, Principles of Universal Personal Telecommunications, Com I-R40-E, Dec. 1991.

²⁹ See CCITT Draft Recommendation E.168, Application of E.164 Numbering Plan for UPT, Temporary Doc. No. 742(Rev. 2) - E, dated Feb. 4-14, 1992, at Geneva.

Therefore, MCI encourages the FCC to oversee the prompt assignment of SACs as a near-term PCS access solution. Furthermore, Non-Geographic NPA codes are critical as a longer-term PCS numbering solution. These codes are currently anticipated in 1995 at the earliest. In order to foster the growth of PCS, MCI urges the FCC to accelerate resolution of issues in all fora concerning Non-Geographic NPA codes and to assign codes in advance of the currently planned 1995 release.

MCI also urges the Commission, when considering the longer-term PCS numbering approaches, not to preclude continued use of the near-term numbering solutions. As these services evolve, there may be continued applications of the services and numbering schemes developed in the near-term. The Commission may want to consider portability on a longer-term basis. The Commission also should ensure that any domestic numbering scheme would be compatible with the international numbering schemes so that international calls could be made and received by the PCS customer. Any future numbering approach should have sufficient flexibility to accommodate the various forms of PCS as they develop.

IV. The Commission Should Approve the Industry's Negotiated Solution for Expansion of Carrier Identification Codes

The Commission asks various questions regarding the expansion of Carrier Identification Codes (CIC) for Feature Group D access to specific carriers (Notice at 5 ¶¶ 36-38). The issues relating to expansion of the CICs have already been discussed at

length in the industry fora. Thus, it is not necessary for the Commission to reconsider CIC expansion because the industry has already reached consensus on a plan for CIC expansion. As mentioned in the Notice, the industry's plan calls for replacing the current 10XXX CIC numbering with 101XXXX numbering. MCI urges the Commission to approve the CIC expansion plan adopted by the industry in forum discussions.

Specifically, the Commission inquires whether it is worthwhile to have a carrier-specific CIC if that number is as long as the local telephone number (i.e., seven digits). MCI offers the following brief explanation, in the event there may be some confusion as to the purpose of the CIC. The CIC and the local telephone number have distinct purposes. To state the obvious, the seven-digit, local telephone number is a number assigned to reach a particular called party, and this number must be dialed each time a call is made to that customer. The CIC is not a form of abbreviated dialing; rather, it is used as an alternative means of accessing a carrier's network. In the Feature Group D environment, the 10XXX CIC may be dialed by the customer to reach the network of the carrier of choice when the customer is away from the customer's presubscribed line or chooses to use a carrier other than the presubscribed carrier. Thus, the answer to the Commission's question -- whether the CIC is worthwhile in the lengthened form agreed among the industry participants -- is: yes.

As a practical matter, the industry has few, if any,

alternatives to expanding the CIC system because the CIC universe is reaching exhaustion.³⁰ The four-digit expansion of the existing CIC format is the only workable solution which can be implemented in the near-term.

Conclusion

Accordingly, MCI advocates replacing Bellcore with a neutral Council and a neutral Registrar, funded equitably by all participants. The Commission would participate in resolving any disputes not resolved in the NANP forum process. MCI urges the


³⁰ The Notice suggests (at 5, FN 49) that the Commission might revisit the Common Carrier Bureau's decision that imminent code exhaustion or number scarcity would not justify denying an end user customer access to the interstate network. Petition of First Data Resources, Inc. Regarding the Availability of Feature Group B Access Service to End Users, Memorandum Opinion and Order, [unpub.] FCC No. 4732, released May 28, 1986 (interstate access services should be made available on a nondiscriminatory basis and without distinction between end users and interexchange carrier customers). MCI urges the Commission not to go against this principle of nondiscrimination in the assignment of numbers.

Commission to institute a rulemaking proceeding to examine future planning of the NANP and other issues related to the NANP.

Respectfully submitted,

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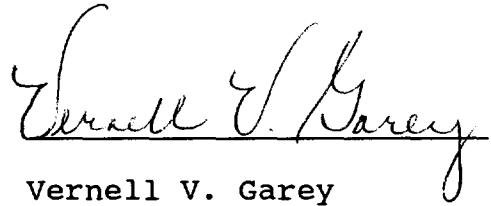
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Filed: December 28, 1992

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that copies of the foregoing "Comments of MCI Telecommunications Corporation", were served by first class mail, postage paid (unless otherwise indicated) on the following parties this 28th day of December, 1992.


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ATTACHMENT A:

AFFIDAVIT OF
RICHARD L. TAYLOR

UNITED STATES DISTRICT COURT FOR
DISTRICT OF COLUMBIA

FILED

NOV 23 1992

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WESTERN ELECTRIC COMPANY, INC.,
AND AMERICAN TELEPHONE AND
TELEGRAPH COMPANY,

Defendants.

Civil Action 82-0192

MOTION TO INTERVENE IN THE PUBLIC INTEREST
AND
AFFIDAVIT OF RICHARD L. TAYLOR, PRO SE

STATE OF NEW JERSEY

COUNTY OF MONMOUTH

)
:
ss.:
)

Richard L. Taylor, of full age, duly sworn upon his oath, deposes and says:

1. I was employed as a Member of Technical Staff by Bell Communications Research, Inc. ("Bellcore") from on or about August 12, 1985 until dismissed on or about March 7, 1991.
2. Bellcore is, upon knowledge and belief, a cartel owned and directed by, seven telecommunications holding companies, known as the Regional Bell Operating Companies ("RBOC"s) which own, control, and derive their principal revenues from, the twenty two Bell Operating Companies ("BOC"s). These BOCs were divested by the original American Telephone and Telegraph Company (AT&T)

under a plan approved by this Court.

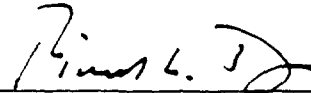
3. Bellcore exists, upon knowledge and belief, at least in part, as a result of actions taken by the United States Department of Justice under the provisions of Pub. L. 51-190, 15 U.S.C. §§1-2 Stat. 209 (the "Sherman Act").
4. Authority for Bellcore's existence is, upon knowledge and belief, vested first in the Modified Final Judgment, 552 F.Supp.131 (1982) §I(B) .
5. This authority reads in two parts: "Notwithstanding separation of ownership, the BOCs may support and share the costs of a centralized organization for the provision of engineering, administrative and other services which can most efficiently be provided on a centralized basis ("PART 1"). The BOCs shall provide, through a centralized organization, a single point of contact for coordination of BOCs to meet the requirements of national security and emergency preparedness (PART 2)."
6. None of the work I was assigned, or which I performed, while employed by Bellcore was authorized by PART 2, as defined above.
7. In late 1987 the Court stated concerns regarding potential anti-competitive actions by the Bellcore cartel, 673 F.Supp.525 (D.D.C. 1987) § IV.
8. These concerns were: "The Bellcore Problem thus resembles the squaring of the circle. If Bellcore's powers are cut back to safeguard against Regional Company collusion in manufacturing, marketing, and purchasing, it will be deprived of the capacity to perform its

national coordinating and standard-setting functions; if its powers are left intact, it will stand as a suitable vehicle for joint Regional Company action with respect to the manufacture of telecommunications equipment and CPE ("The Bellcore Problem")."

9. During the period from about January 1, 1987 and continuing through December, 1987, I was asked to, and I did, PART 1 work which, upon current knowledge and belief, was intended to be and did in fact violate provisions of the Sherman Act.
10. I was directed to, and I did, conspire with my Bellcore management, and conspire jointly also with members of each of the seven RBOCs, to provide the technical means necessary to leverage monopoly voice telecommunications access to create monopoly local access to ISDN, a new digital telecommunications technology that is not otherwise a natural monopoly.
11. This conspiracy resulted in a successful execution of a covert plan to discard two existing draft American national ISDN standards at a T1 standards meeting held in 1987, and their replacement with an earlier Bell System standard that was being balloted at the international standards body, CCITT. This replacement standard was designed for telecommunications monopolies: state monopolies overseas, the Bell System monopoly within the United States.
12. I was directed to, and I did, generate and provide massive detailed technical justifications in support of these anti competitive objectives and purposes.

13. As a direct result of these actions, the American National Standards Institute ISDN standard, numbered T1.602, contains unfair and otherwise unnecessary technical provisions designed to insure BOC monopolies on local ISDN access.
14. I was also directed to, and I did, conspire with my Bellcore management, and conspire jointly also with members of each of the seven RBOCs, to go beyond even the unfair public standard in efforts to insure BOC monopoly access to ISDN.
15. For these purposes, I designed technical data link access restrictions that were supposedly "protective," but which in fact were designed to prevent competition.
16. Also for these purposes, I bundled data link access with other exclusively BOC-provided ISDN services, when there were no purely technical reasons for such bundling.
17. These technical protective and service-bundled ISDN technical switch requirements are contained in documents I wrote, Bellcore's relevant ISDN Technical Advisory and Technical Reference (documents numbered TA-TSY-000793 and TR-TSY-000793, Issue 1, respectively).
18. Further, these ISDN switch requirements, incorporating technical features designed to insure local BOC ISDN access monopolies, were used by Bellcore and the RBOCs in joint procurement activities that took place under a Bellcore plan known as "9-on-1" meetings.

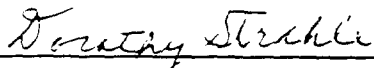
19. I therefore move to intervene in this case on grounds of the public interest, and ask the Court to reconsider the plan of divestiture as it relates to Bellcore.



Richard L. Taylor

11 Bay Street, Rumson, N.J. 07760

Subscribed and sworn to before me
this 19th day of November 1992.



Notary Public

My Commission Expires

DOROTHY STRAHLE

Notary Public State of New Jersey

My Commission Expires June 5, 1997

ATTACHMENT B:

**PROPOSED NORTH AMERICAN
NUMBERING PLAN (NANP)
FORUM PROCESS**